

# EXHIBIT 157

EXHIBIT 32  
 WIT: Casey  
 DATE: 4/7/23  
 C. Campbell, RDR CRR CSR #13921

JPMORGAN CHASE &amp; CO.

## Legal and Compliance

POLICY DETAILS	
<b>POLICY TITLE</b>	Private Bank UHNW - Anti-Money Laundering/Know Your Client Policy – SECTION E: CLIENT CASH TRANSACTION GUIDELINES
<b>EFFECTIVE DATE</b> mm/dd/yyyy	07/01/2006
<b>LAST REVIEW DATE</b> mm/dd/yyyy	11/20/2012
<b>PRIMARY CONTACT</b> Name/SID	Melissa Everett (V093891)
<b>SECONDARY CONTACT</b> Name/SID	Christine Farquhar (E011146), Jeanette Peplowski (A002119)
<b>OWNER GROUP</b>	Legal/Compliance
<b>POLICY LEVEL</b>	<input type="checkbox"/> Firmwide <input type="checkbox"/> Business <input type="checkbox"/> Regional <input checked="" type="checkbox"/> Sub-Business
APPLICABILITY	
<b>BUSINESS GROUP</b>	Asset Management: Private Bank Ultra High Net Worth
<b>LOCATION</b>	North America: United States
<b>FIRMWIDE CATEGORY</b>	Compliance and Regulatory

## Private Bank (UHNW)

## ANTI-MONEY LAUNDERING/KNOW YOUR CLIENT POLICY

**SECTION E:**  
**CLIENT CASH TRANSACTION GUIDELINES**  
Introduction

The receipt of large cash deposits and disbursements of cash withdrawals for other than client casual spending needs is discouraged.

It is the primary responsibility of the Banker to obtain explanations on the source of the cash and acceptability of the intended use of the cash, and to assess the plausibility of these explanations for large cash transactions.

Cash transactions should be conducted on the Firm premises or through banks which the firm has the requisite contractual relationship, known as “partner” banks. Any off premise pickup or delivery of cash to clients or third parties made at the client’s request must be reported to Risk Management & Control or Compliance, and have the prior written approval of the appropriate Area Head or designee.

U.S. locations that effect transactions involving currency, including deposits, withdrawals, exchanges, check cashing and instrument purchases, shall report (FinCEN form 105 – Currency

Transaction Report) and record all such transactions in excess of (U.S.) \$10,000. The Private Bank may rely on another LOB (Retail Financial Services) to file the CTR where cash transactions are conducted at a retail branch and maintain the listing of Private Bank clients with a CTR Exemption.

Non-U.S. branches and subsidiaries are not required to file FinCEN Form 105 – Currency Transaction Report (CTR). However, if a non-U.S. country has similar reporting rules, the location processing unit must comply with these in-country requirements.

Structuring is the breaking down of currency transactions below the reporting threshold (e.g., U.S. >\$10,000) in an attempt to evade reporting requirements. The Private Bank will not assist a client in structuring any transaction for the purpose of evading the reporting requirements.

### **I. Cash Transactions In Locations Other Than The Booking Unit**

A booking unit may, unless local procedures provide otherwise, accept cash transactions for Private Bank clients whose accounts are held at another Private Bank location if the booking unit is operationally in a position to do so.

In instances in which a client is making a cash deposit or withdrawal at a location other than the booking unit, in addition to completing any transaction documents required by local procedures, the Banker must notify appropriate personnel at the location where the transaction will occur. The notification should include information regarding the individual who is expected to conduct the transaction and the manner in which he or she will be properly identified.

### **II. Process**

All recorded information and approvals for a cash transaction must be recorded in accordance with local procedures.

Documentation, including any form used, must be submitted along with the appropriate written approvals to the teller or processing department who is responsible for assuring appropriate approvals have been obtained. If it is not feasible to obtain written approval prior to the time of the transaction, verbal approval may be obtained, in accordance with local procedures. Written approval must be submitted as soon as possible thereafter.

The relevant area Risk Management & Control or Compliance officer will monitor cash transactions to identify potential structuring occurrences in accordance with the local AML monitoring process. In addition, quarterly Cash Transaction Reports will be generated by AML Operations, which will then be used by Risk Management & Control to identify those customers posing higher risk due to significant cash activity. The assessment of risk will be facilitated by completion of an appropriate cash questionnaire.

### **III. Exceptions**

Requests for exceptions to the Client Cash Transaction Guidelines must be approved in writing by the Area Head or designee.

**IV. Related Policies**

**This procedure must be used in conjunction with the Private Bank Identification And Investigation Of Unusual Or Suspicious Activity; Non-Compliance With Sponsorship Criteria; Escalation And Reporting Procedure, which delineates the process to be followed in the event suspicious client account activity is recognized.**

**V. Questions**

Any questions concerning this procedure should be directed to the relevant Risk Management & Control or Compliance officer.